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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 18, 2020

U.S. Environmental Protection Agency
EPA Docket Center, Docket ID No. EPA-HQ-OAR-2018-0746
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing Residual Risk and Technology Review, Docket ID No. EPA-HQ-OAR-2018-0746

Dear Sir or Madam:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to respond to the U.S. Environmental Protection Agency's (EPA) request for comments in the notice published in the December 17, 2019 edition of the Federal Register (FR) entitled: "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing Residual Risk and Technology Review."

The TCEQ is submitting the attached two documents in response to EPA's specific request for comments on the use of an alternative ethylene oxide unit risk estimate (URE) for this source category. The attached documents are: TCEQ's revised Ethylene Oxide Carcinogenic Dose-Response Assessment Development Support Document (DSD), and the TCEQ's response to public comments on the initial draft of the DSD. The attached DSD has been revised in response to extensive public comments received on the June 2019 draft Ethylene Oxide DSD. The public commenters included the first author of the EPA's 2016 Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide Jennifer Jinot (acting as a scientific consultant to the University of California at San Francisco), Kyle Steenland (who analyzed the key NIOSH cohort data upon which EPA's assessment ultimately relied), as well as scientists and interested persons associated with many other organizations including the American Chemistry Council, the Sierra Club, the Union of Concerned Scientists, the Environmental Defense Fund, the Ethylene Oxide Sterilization Association, the Houston Health Department, the Natural Resources Defense Council, the Advanced Medical Technology Association, and others. The TCEQ has thoroughly considered these reviews from scientists in the field and has modified the DSD in response. In addition to the substantive and thorough expert review of the draft DSD provided by several scientists with extensive subject matter expertise (to which the TCEQ has provided detailed responses), the Risk Science Center at the University of Cincinnati is conducting an independent expert peer review on the revised Ethylene Oxide DSD and the response to comments document and the peer review is expected to be completed in Spring 2020.

If you have any questions concerning the enclosed documents, please contact Allison Jenkins, Toxicology, Risk Assessment, and Research Division, Office of the Executive Director, at 512-239-0656 or allison.jenkins@tceq.texas.gov.

Sincerely,


Toby Baker
Executive Director

Enclosures

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